

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

HENRY NARANJO and
MARLENE RAMIREZ,

CASE NO. 00-6022-CIV-LENARD

Plaintiff,

vs.

STEPHEN BYRON SMITH,

Defendant.

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ANSWER AND AFFIRMATIVE DEFENSES

Defendant STEPHEN BYRON SMITH, by and through his undersigned counsel, herewith files his answer and affirmative defenses to plaintiffs' complaint, and states and avers the following:

ANSWER

1. Defendant is without knowledge as to the material allegations set forth in paragraphs 1, 2, 3, 8, and 10, and therefore denies same.
2. Defendant admits paragraph 4.
3. Defendant admits that at all times material hereto plaintiff Henry Naranjo was employed by Bradford Marine as a welder but except as expressly admitted herein, all other allegations of paragraph 9 are denied.
4. Defendant denies all remaining paragraph of plaintiffs' complaint and demands strict proof thereof.

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